

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JANE DOE 1, individually and on behalf of all  
others similarly situated,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.,

Defendant/Third-Party Plaintiff.

Case No. 22-cv-10019-JSR

JURY TRIAL DEMANDED

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JPMORGAN CHASE BANK, N.A.,

Third-Party Plaintiff,

v.

JAMES EDWARD STALEY,

Third-Party Defendant.

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**JPMORGAN CHASE BANK, N.A.'S MOTION FOR LEAVE TO  
WITHDRAW RACHEL S. MORSE AS COUNSEL OF RECORD**

Defendant/Third-Party Plaintiff, JPMorgan Chase Bank, N.A., by and through undersigned counsel, respectfully submits this Motion for Leave to Withdraw Rachel S. Morse as Counsel of Record. In support, Defendant/Third-Party Plaintiff states as follows:

1. On February 6, 2023, the Court entered an Order [Docket No. 42] granting admission *pro hac vice* to Rachel S. Morse as counsel for Defendant/Third-Party Plaintiff in the above-captioned litigation.

2. Defendant/Third-Party Plaintiff now moves for leave to withdraw Ms. Morse's appearance in this action because as of October 20, 2023 Ms. Morse will no longer be associated

with the law firm of Massey & Gail LLP and therefore will no longer represent Defendant/Third-Party Plaintiff in this litigation.

3. Withdrawal is sought with notice to and consent from Defendant/Third-Party Plaintiff. Defendant/Third-Party Plaintiff remains represented in this action by legal counsel from Wilmer Cutler Pickering Hale and Dorr LLP and Massey & Gail LLP, including but not limited to undersigned counsel.

4. Granting this motion will not cause any undue delay in these proceedings or prejudice any party.

WHEREFORE, the Defendant/Third-Party Plaintiff, JPMorgan Chase N.A., by counsel, respectfully requests that the Court grant this motion and enter an Order permitting the withdrawal of Rachel S. Morse as counsel of record and removing her from the list of attorneys receiving electronic notices of filings and proceedings in this action.

Dated: October 19, 2023

Respectfully submitted,

/s/ Leonard A. Gail

Leonard A. Gail (*pro hac vice*)

MASSEY & GAIL LLP

50 East Washington Street, Suite 400

Chicago, IL 60602

(t) (312) 283-1590

lgail@masseygail.com

Felicia H. Ellsworth (*pro hac vice*)

John J. Butts (*pro hac vice*)

Andrés O’Laughlin (*pro hac vice*)

WILMER CUTLER PICKERING

HALE AND DORR LLP

60 State Street

Boston, MA 02109

(t) (617) 526-6000

(f) (617) 526-5000

felicia.ellsworth@wilmerhale.com

john.butts@wilmerhale.com

andy.olaughlin@wilmerhale.com

Boyd M. Johnson III  
Robert L. Boone  
Alan E. Schoenfeld  
Christopher Bouchoux  
WILMER CUTLER PICKERING  
HALE AND DORR LLP  
7 World Trade Center  
250 Greenwich Street  
New York, NY 10007  
(t) (212) 230-8800  
(f) (212) 230-8888  
boyd.johnson@wilmerhale.com  
robert.boone@wilmerhale.com  
alan.schoenfeld@wilmerhale.com  
christopher.bouchoux@wilmerhale.com

*Attorneys for JPMorgan Chase Bank, N.A.*